

## **Power Integrations v. Fairchild**

### **Exhibit 10**

#### **Power Integrations' Opinion Testimony**

Power Integrations intends to call the following experts to testify in person at trial to provide opinions on the subjects described:

##### **Robert Blauschild**

Mr. Blauschild has worked extensively in the field of analog and mixed-signal circuit design. After obtaining a BSEE degree from Columbia University in 1971 and an MSEE degree from U.C. Berkeley in 1973, Mr. Blauschild joined the Analog Research Department of Signetics. He became Manager of Analog Research in 1976, with a department charter to investigate the application of new process technologies to analog functions. Mr. Blauschild's status with Signetics became that of a consultant in 1981, which allowed him to work with other companies including Hughes, Micro Linear, Exar, Stanford Telecom, and many others. He rejoined Signetics as Manager of Advanced Development in 1990. The charter of Mr. Blauschild's department at that time was to do advanced designs with existing IC processes, the first designs with new IC processes, and consult with other departments on the development of all projects with analog content. He was also responsible for working with the wafer fabrication groups in developing new IC processes and devices.

Mr. Blauschild has worked on and consulted on designs of a wide range of analog and mixed-signal circuits, including data converters, amplifiers, voltage and current references and regulators, timing circuits, line drivers and receivers, display circuits, phase-locked loops, and modems. Mr. Blauschild has fourteen US patents and has designed over two dozen products with cumulative sales above \$250 Million.

Mr. Blauschild has also participated as a panelist at various industry conferences, and taught several short courses and seminars in the U.S., Europe, and Japan. After presenting two technical papers at the 1978 International Solid-State Circuits Conference (ISSCC), Mr. Blauschild was chosen by the 1979 conference chairman to serve on the ISSCC Program Committee, and has been similarly chosen 15 times since then. Mr. Blauschild has twice a member of the European Solid-State Circuits Conference Program Committee. His work on these committees consisted of evaluating submitted papers for originality and import, and deciding on rejection or acceptance for presentation at the conferences. Mr. Blauschild's designs and lectures have spanned a wide range of technologies, including NMOS, CMOS, BiCMOS, and Bipolar processing.

Mr. Blauschild will testify that all three of Power Integrations' circuit patents in this case, U.S. Patent Nos. 6,249,876 B1 ("the '876 patent"), and 6,107,851 ("the '851 patent"), 6,229,366 B1 ("the '366 patent") are infringed by Fairchild's accused FPS devices. Mr. Blauschild will also testify that Power Integrations' circuit patents are not invalid, including that the circuit patents are not obvious or anticipated, and that any allegedly withheld prior art was not material. Mr. Blauschild's expected testimony is set forth more fully in his expert reports and deposition testimony.

**Michael Shields**

Mr. Shields has at least forty years of semiconductor industry experience, including four years at the Marconi Company in the UK, over thirty years at Philips/Signetics (Philips acquired Signetics in 1975), and five years at Immlink Technology. During the course of Mr. Shields' work in the industry, he has worked on semiconductor device design, has managed multiple development teams, has overseen the building of and has run multiple fabrication facilities, and has been responsible for Philips' future designs and process roadmaps.

Mr. Shields also holds several patents. He has guest lectured at Stanford University and at U.C. Berkeley extension. Mr. Shields has been a panel member at SEMI ISS, SEMI SBC, and has given talks at Wescon and at several IEEE meetings. Mr. Shields has a Bachelor of Science degree in Physics from Imperial College, London University, and a Master of Science degree in Electrical Engineering from San Jose State University.

Mr. Shields will testify that Fairchild's accused FPS products, all of which are manufactured with Fairchild's SDG3 and SDG4 semiconductor fabrication processes, infringe Power Integrations' '075 patent. Mr. Shields will also testify that Power Integrations' '075 patent is not invalid, including that the '075 patent is enabled, is not obvious or anticipated, and that any allegedly withheld prior art was not material. Mr. Shields's expected testimony is set forth more fully in his expert reports and deposition testimony.

**Richard Troxel**

Mr. Troxel is a Certified Public Accountant and a Certified Management Accountant with over 30 years of accounting and consulting work to his name including several years with a firm he founded in 1990. He is a member of the American Institute of Certified Public Accountants, the Virginia Society of Certified Public Accountants, and the Institute of Management Accountants. Mr. Troxel received a Bachelor of Science degree from Ohio State University and a Master of Business Administration from the University of Minnesota. He has published several articles in various technical journals, taught accounting, cost accounting, and management courses at the University of Minnesota and St. Thomas University, and has been a frequent speaker before management and professional groups. Mr. Troxel has consulted for a wide variety of industrial, financial, and government clients, and his litigation experience includes the calculation and analysis of major damage models in patent infringement, antitrust, and contractual matters. He has testified at trial and been deposed as an expert accounting witness on numerous occasions regarding damages, lost profits, profitability measures, cost allocation and assignment methods, among other topics.

Mr. Troxel will testify about the type and amount of damages Power Integrations has suffered as a result of Fairchild's infringement of the patents-in-suit. Specifically, Mr. Troxel will testify that Power Integrations is entitled to damages for lost profits from lost sales to Fairchild, for price erosion attributable to infringing competition from Fairchild, and/or for reasonable royalties on Fairchild's sales of the infringing parts. Mr. Troxel's expected testimony is set forth more fully in his expert reports and deposition testimony.

# Exhibit 11

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# Exhibit 12

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# Exhibit 13

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**Power Integrations v. Fairchild****Exhibit 14****Power Integrations' Designation of Fairchild's Discovery Responses**

<b>Discovery Response</b>	<b>Fairchild's Objection(s)</b>
Fairchild's Response to Interrogatory No. 6	<b>R, P, Inc., Overbroad</b>
Fairchild's Response to Interrogatory No. 8	<b>R, P, Inc., Overbroad</b>
Fairchild's Response to Interrogatory No. 9	<b>R, P, Inc., Overbroad</b>
Fairchild's Response to Interrogatory No. 10	<b>R, P, Overbroad</b>
Fairchild's Response to Interrogatory No. 12	<b>R, P</b>
Fairchild's Response to Interrogatory No. 13	<b>R, P</b>
Fairchild's Response to Interrogatory No. 16	<b>R, P, Overbroad</b>

Further, Fairchild incorporates the general and specific objections made in response to each interrogatory.

**Key:**

**R – Lacks relevance (Fed. R. Evid. 402)**

**P – Any probative value is substantially outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury, or by considerations of undue delay, waste of time, or needless presentation of cumulative evidence (Fed. R. Evid. 403)**

**Inc. – Incomplete; Power Integrations has recently asked Fairchild to supplement its responses to a number of interrogatories. Fairchild is investigating and may supplement its response to this interrogatory.**

**Overbroad – The Court limited discovery concerning sales to October 20, 2004.**